IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Bankruptcy Matter of:

Heidi Brown-Polk

Debtor

Bankruptcy No. 19-02277
Judge LaShonda A. Hunt
Chapter: 13

NOTICE OF FILING

TO: Heidi Brown-Polk, 932 E. 46th St., Chicago, IL 60653
Marilyn O Marshall, 224 South Michigan Ste 800, Chicago, IL 60604
Jordan TraVaille Hoffman, Jordan TraVaille Hoffman, P.C., 11528 S. Halsted St.,
Chicago, IL 60628
Patrick S Layng, Office of the U.S. Trustee, Region 11, 219 S Dearborn St, Room 873,
Chicago, IL 60604

Please take notice on February 15, 2019, the attached Objection to Confirmation of was
electronically filed with the Clerk of the Bankruptcy Court for the Northern District of Illinois.

CERTIFICATE OF SERVICE

I, Kenneth W. Bach, an attorney, certify that I served the attached Objection to Confirmation by
mailing a copy to the Debtor at the address listed above by depositing the same in the U.S. mail,
first class, postage prepaid at 230 W. Monroe, Chicago, IL 60606 on or before 5:00 p.m. on
February 15, 2019. The remaining parties were served by the CM/ECF electronic noticing
system.

/s/ Kenneth W. Bach
Kenneth W. Bach, ARDC #6295816
Attorney for Deutsche Bank National Trust
Company, as Trustee, in trust for registered Holders
of Long Beach Mortgage Loan Trust 2006-WL2,
Asset-Backed Certificates, Series 2006-WL2

Kenneth W. Bach
Johnson, Blumberg, & Associates, LLC
230 W. Monroe Street, Suite 1125
Chicago, Illinois 60606
Ph. 312-541-9710
Fax 312-541-9711

NOTICE:
THIS LAW FIRM IS ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION
OBTAINED WILL BE USED FOR THAT PURPOSE

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OBJECTION TO CONFIRMATION

NOW COMES Deutsche Bank National Trust Company, as Trustee, in trust for registered Holders of Long Beach Mortgage Loan Trust 2006-WL2, Asset-Backed Certificates, Series 2006-WL2 (hereinafter "Creditor"), through its attorney, Kenneth W. Bach of Johnson, Blumberg & Associates, LLC, and states as follows:

1. The above-captioned Chapter 13 case was filed on January 27, 2019.

2. The Creditor, a party in interest, holds a Mortgage dated Jane 24, 2005 on the property located at 932 E 46th Street, Chicago, Illinois 60653, in the original amount of $299,900.00.

3. The payoff balance due as the filing date of this case is $376,756.98.

4. Movant's arrearage claim is $58,283.73.

5. The Debtor's plan does not provide treatment for Creditor's claim, nor does it provide for the surrender of the collateral.

6. Moreover, although it appears that it was the Debtor's intention to provide for Creditor's claim through Trustee payments for both ongoing mortgage payments and pre-petition arrears, the plan is severely underfunded. Creditor's claim alone would require approximately $86,139.00 for the ongoing payments, plus $58,283.73 for the arrears. The total amount to be paid to the Trustee is only $60,000.00.

7.   By failing to provide treatment for Creditor's claim, nor surrendering the collateral,

the proposed plan fails to meet the requirements of 11 U.S.C. § 1125(a)(5) and should

not be confirmed.

WHEREFORE, Deutsche Bank National Trust Company, as Trustee, in trust for registered
Holders of Long Beach Mortgage Loan Trust 2006-WL2, Asset-Backed Certificates, Series
2006-WL2 prays that confirmation of the Debtor's plan be denied and for such other relief as the
Court deems just.

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/s/ Kenneth W. Bach

Kenneth W. Bach, ARDC #6295816
Attorney for Deutsche Bank National Trust
Company, as Trustee, in trust for registered
Holders of Long Beach Mortgage Loan Trust
2006-WL2, Asset-Backed Certificates, Series
2006-WL2

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